

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|-----------------------------|---|------------------------|
| SARA S. ECHEVARRIA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | NO.: 05-284 GMS |
| |) | |
| U-HAUL INTERNATIONAL, INC., |) | |
| ROGER MAYFIELD, and |) | TRIAL BY JURY DEMANDED |
| NATIONWIDE GENERAL |) | |
| INSURANCECOMPANY, |) | |
| Defendants. |) | |

**PLAINTIFF'S SECOND SET OF INTERROGATORIES DIRECTED TO
DEFENDANT U-HAUL INTERNATIONAL, INC.**

1. State the size of the ball on the trailer hitch on the vehicle rented to Mayfield at the time it was rented to him.

ANSWER:

2. Identify the manufacturer of the trailer rented to Mayfield and the manufacturer of the coupler on the trailer rented to Mayfield.

ANSWER:

3. Identify who currently has possession of the coupler that was attached to the trailer rented to Mayfield. If the answer is unknown, state the date defendant last had possession of the coupler and who it was given to or, otherwise, what became of it.

ANSWER:

4. Identify by name, address and phone number, the individual or individuals who rented the vehicle and trailer to Mayfield in Florida.

ANSWER:

5. Identify by name, last known address and phone number, the last five renters of the trailer rented to Mayfield who rented the trailer prior to Mayfield and state the dates when those renters had possession of the trailer.

ANSWER:

6. Identify by name, last known address and phone number, the individual or individuals who rented the trailer rented by Mayfield to the individuals identified in response to Interrogatory No. 5.

ANSWER:

7. State all facts supporting each affirmative defense raised by U-HAUL International, Inc. in its Answer to the Complaint

ANSWER:

MURPHY SPADARO & LANDON

/s/ Roger D. Landon

ROGER D. LANDON (#2460)
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Wilmington, DE 19805
(302) 472-8112
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I, Roger D. Landon, Esq., do hereby certify that on this 1st day of March, 2006, two copies of **PLAINTIFF'S SECOND SET OF INTERROGATORIES DIRECTED TO DEFENDANTS U-HAUL INTERNATIONAL, INC.** were delivered via e-file to the following individual(s):

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